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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18
19 SECURITIES AND EXCHANGE
20 COMMISSION,

21 Plaintiff,

22 vs.

23 BANC DE BINARY LTD, OREN
24 SHABAT LAURENT (f/k/a OREN
25 SHABAT), ET BINARY OPTIONS LTD.,
26 BO SYSTEMS LTD. SEYCHELLES and
27 BDB SERVICES LTD. SEYCHELLES,

28 Defendants.

Case No.: 2:13-cv-00993-RCJ-VCF

29 **STIPULATION AND [PROPOSED] ORDER**
30 **FOR MODIFICATIONS TO SCHEDULING**
31 **ORDER**

32 **Stipulation and [Proposed] Order for**
33 **Extension Of Time**
34 **(second request)**

35 WHEREAS, Plaintiff Securities and Exchange Commission (the “SEC”) filed its initial
36 Complaint against Defendant Banc de Binary Ltd (“BdB Ltd”) on June 5, 2013;

37 WHEREAS, the Court entered a Joint Discovery Plan and Scheduling Order on August
38 27, 2013 (Dkt. No. 36) (the “Scheduling Order”);

1 WHEREAS, the SEC filed a First Amended Complaint against BdB Ltd and Oren Shabat
2 Laurent on January 16, 2014;

3 WHEREAS, upon stipulation of the parties, the Court entered a revised Scheduling Order
4 on February 14, 2014 (Dkt. No. 51) (the “Revised Scheduling Order”);

5 WHEREAS, the SEC filed a Second Amended Complaint against BdB Ltd, Oren Shabat
6 Laurent, ET Binary Options Ltd., BO Systems Ltd. Seychelles, and BDB Services Ltd.
7 Seychelles on March 11, 2014;

8 WHEREAS, Oren Shabat Laurent filed his answer to the Second Amended Complaint on
9 April 7, 2014, and the entity defendants—BdB Ltd, ET Binary Options Ltd., BO Systems Ltd.
10 Seychelles, and BDB Services Ltd. Seychelles—filed their answer to the Second Amended
11 Complaint on April 23, 2014;

12 WHEREAS, counsel for the SEC and counsel for the defendants have been working
13 together in connection with the written discovery, document productions and depositions in the
14 case as to, among other things, the parties added to the case by the Second Amended Complaint;

15 WHEREAS, the SEC took the depositions of Oren Shabat Laurent, the Rule 30(b)(6)
16 designees of the entity defendants and Yehezkel Shabat during the week of July 7, 2014;

17 WHEREAS, the parties have recently resolved some outstanding discovery disputes—as
18 to, among other things, the parties recently added to the case—the complexity of which has been
19 heightened in part by the location of many of the discovery materials in foreign locales;

20 WHEREAS, the parties’ resolution of those outstanding discovery disputes, despite the
21 parties’ efforts, was not achieved prior to the expiration of the 21-day period under Local Rule
22 26-4 within which to request an extension of the scheduling order;

23 WHEREAS the parties were nonetheless able to resolve these issues without the
24 intervention of the Court;

25 WHEREAS, the parties have met and conferred, and agree to, and respectfully request,
26 the following modifications to the Scheduling Order to ensure time for the parties to address
27 these recently resolved issues; and

28 WHEREAS, this is the parties’ second request to modify the Scheduling Order;

1 FOR THE REASONS SET FORTH ABOVE, IT IS HEREBY STIPULATED, by and
2 among counsel for the parties as follows:

3 1. The parties stipulate and agree to the following changes to the Revised
4 Scheduling Order:

5 a. The discovery cut-off date shall be extended from July 18, 2014 to
6 September 19, 2014. *See Dkt. No. 51 (Scheduling Order) at 3.*

7 b. The cut-off for written discovery shall be extended from July 18, 2014 to
8 September 19, 2014. *See id.*

9 c. The cut-off for oral discovery shall be extended from July 18, 2014 to
10 September 19, 2014. *See id.*

11 d. The due date for dispositive motions shall be extended from August 15,
12 2014 to October 10, 2014. *See id.*

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1 e. The due date for the joint pre-trial order shall be extended from September
2 19, 2014 to November 14, 2014. *See id.*

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4 Dated: July 11, 2014

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6 Dated: July 11, 2014

7 /s/ Amy J. Longo
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11
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15
16 *Attorneys for Defendants*

17 Dated: 7-14-2014



18
19 The Honorable Cam Ferenbach
United States Magistrate Judge
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1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to this action. My business address is:

3 U.S. SECURITIES AND EXCHANGE COMMISSION,
4 5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036-3648
Telephone No. (323) 965-3213; Facsimile No. (323) 965-3908.

5 On July 11, 2014, I caused to be served the document entitled **STIPULATION AND**
6 **[PROPOSED] ORDER FOR MODIFICATIONS TO SCHEDULING ORDER**

7 on all the parties to this action addressed as stated on the attached service list:

8 **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and
9 mailing today following ordinary business practices. I am readily familiar with this agency's
practice for collection and processing of correspondence for mailing; such correspondence would
be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

10 **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I
11 personally deposited with the U.S. Postal Service. Each such envelope was deposited with the
U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

12 **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly
13 maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with
Express Mail postage paid.

14 **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of
15 the addressee as stated on the attached service list.

16 **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United
17 Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility
regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

18 **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the
electronic mail address as stated on the attached service list.

19 **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF
20 system, which effects electronic service on counsel who are registered with the CM/ECF system.

21 **FAX:** By transmitting the document by facsimile transmission. The transmission was
reported as complete and without error.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Date: July 11, 2014

/s/ Amy J. Longo

24 Amy J. Longo

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SEC v. Banc de Binary Ltd, et al.
United States District Court – District of Nevada
Case No. 2:13-cv-00993-RCJ-VCF

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